

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)
) Case No.: 10-50494
FAIR FINANCE COMPANY,)
) Chapter 7
Debtor.)
) Judge Jessica E. Price Smith

**SIXTH FEE APPLICATION FOR ALLOWANCE OF INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
OCTOBER 1, 2018 THROUGH AND INCLUDING AUGUST 31, 2019, FILED BY
SKODA MINOTTI AS CONSULTING AND TESTIFYING EXPERT FOR THE ESTATE**

Name of Applicant:	Skoda, Minotti, Certified Public Accountants, an Ohio Corporation ("Skoda Minotti")
Authorized to Provide Professional Services as:	Consulting and testifying expert for the estate of debtor Fair Finance Company ("Debtor")
Date of Retention:	September 10, 2013
Period for Which Compensation and Reimbursement is Sought:	October 1, 2018 – August 31, 2019
Amount of Compensation for Services Sought as Actual, Reasonable and Necessary:	\$9,956.35
Amount of Expenses Sought to be Reimbursed as Actual, Reasonable and Necessary:	\$239.39
Total Amount of Fees and Expenses Sought to be Reimbursed as Actual, Reasonable and Necessary:	\$10,195.74

This application is: x interim final. If this is not the first application filed, please state the following for each other application:¹

¹ As detailed below, Skoda Minotti replaced Howard L. Klein Co. as a consulting and testifying expert for the estate when Mr. Klein joined the Skoda Minotti firm in September 2013. This is Skoda Minotti's fifth interim fee application. The chart below provides information about fees and expenses requested in prior applications filed by Howard L. Klein Co. and Skoda Minotti.

<u>Date Filed</u>	<u>Period Covered</u>	<u>Requested Fees / Expenses</u>	<u>Approved Fees / Expenses & Date</u>
August 10, 2011	February 22, 2010 – December 31, 2010	<u>Fees</u> : \$298,156.25 <u>Expenses</u> : \$11,200.63	<u>Fees</u> : \$298,156.25 <u>Expenses</u> : \$11,200.63 <u>Date</u> : October 6, 2011
October 30, 2012	January 1, 2011 – September 30, 2012	<u>Fees</u> : \$575,600.00 <u>Expenses</u> : \$7,639.15	<u>Fees</u> : \$575,600.00 <u>Expenses</u> : \$7,639.15 <u>Date</u> : November 29, 2012
October 23, 2013	October 1, 2012 – August 31, 2013	<u>Fees</u> : \$184,462.50 <u>Expenses</u> : \$371.70	<u>Fees</u> : \$184,462.50 <u>Expenses</u> : \$371.70 <u>Date</u> : December 31, 2013
September 30, 2014	September 1, 2013 – August 31, 2014	<u>Fees</u> : \$298,941.75 <u>Expenses</u> : \$156.93	<u>Fees</u> : \$298,941.75 <u>Expenses</u> : \$156.93 <u>Date</u> : November 19, 2014
September 24, 2015	September 1, 2014 – August 31, 2015	<u>Fees</u> : \$67,284.20 <u>Expenses</u> : \$78.80	<u>Fees</u> : \$67,284.20 <u>Expenses</u> : \$78.80 <u>Date</u> : November 17, 2015
September 28, 2016	September 1, 2015 – June 30, 2016	<u>Fees</u> : \$54,860.20 <u>Expenses</u> : \$24.15	<u>Fees</u> : \$54,860.20 <u>Expenses</u> : \$24.15 <u>Date</u> : October 24, 2016
November 28, 2017	July 1, 2016 – September 30, 2017	<u>Fees</u> : \$344,929.05 <u>Expenses</u> : \$865.87	<u>Fees</u> : \$344,929.05 <u>Expenses</u> : \$865.87 <u>Date</u> : January 11, 2018
October 16, 2018	October 1, 2017 – September 30, 2018	<u>Fees</u> : \$63,339.40 <u>Expenses</u> : \$129.08	<u>Fees</u> : \$63,339.40 <u>Expenses</u> : \$129.08 <u>Date</u> : November 8, 2018

PROFESSIONAL CERTIFICATION

I, Howard L. Klein, certify that I reviewed the billing records on a monthly basis as required by the court's standing order.

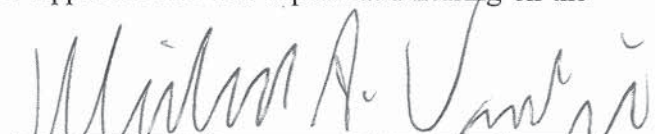


(Signature)

CLIENT CERTIFICATION

I have reviewed this Application as counsel for the duly-appointed Chapter 7 Trustee for debtor Fair Finance Company. In that capacity, I x approve this Application; [or] do not approve this Application for reasons which I have discussed with the Applicant and will explain at a hearing on the Application.

Date: 10-28-2019


Michael A. VanNiel

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	
)	Case No.: 10-50494
FAIR FINANCE COMPANY,)	
)	Chapter 7
Debtor.)	
)	Judge Jessica E. Price Smith

**SIXTH FEE APPLICATION FOR ALLOWANCE OF INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OCTOBER 1, 2018
THROUGH AND INCLUDING AUGUST 31, 2019, FILED BY SKODA MINOTTI AS
CONSULTING AND TESTIFYING EXPERT FOR THE ESTATE**

Skoda, Minotti, Certified Public Accountants, an Ohio Corporation (“**Skoda Minotti**”) submits this Fifth Fee Application for Allowance of Interim Compensation and Reimbursement of Expenses for the Period October 1, 2018 through and including August 31, 2019 (the “**Application**”) pursuant to 11 U.S.C. §§ 330 and 331. In support of this Application, Skoda Minotti states as follows:

INTRODUCTION

1. On February 8, 2010, creditor-investors filed a petition for involuntary bankruptcy against Fair Finance Company (the “**Debtor**”).

2. On March 2, 2010, the Court entered an order granting the relief sought by the petitioning creditor-investors *nunc pro tunc* as of February 24, 2010, and appointing Brian A. Bash (the “**Trustee**”) as the duly-appointed trustee of the Debtor.

3. As part of his duty to administer and liquidate the estate for the benefit of creditors, the Trustee has needed to conduct a thorough forensic examination of the Debtor’s assets and liabilities and pursue litigation to recover assets. The Trustee’s ongoing litigation includes, but is not limited to, the action captioned *Bash v. Textron Financial Corp., et al.*, Adversary Proceeding

No. 12-05101 in the United States Bankruptcy Court for the Northern District of Ohio (Honorable Arthur I. Harris) and Case No. 12-cv-00987 in the United States District Court for the Northern District of Ohio (Honorable Patricia A. Gaughan) (the “**Textron Litigation**”).

4. On March 23, 2010, this Court entered an order authorizing the Trustee to engage Howard L. Klein, the principal and sole shareholder of Howard L. Klein Co. (“**HLK**”), as a forensic accountant to the Debtor’s estate. On November 2, 2010, the Trustee filed a supplemental application requesting court approval to expand the scope of HLK’s retention to include services as an expert witness [Dkt. No. 301]. On February 28, 2011, this Court entered an order authorizing HLK to serve as an expert witness for the estate [Dkt. No. 341]. From March 23, 2010 through the end of August 2013, HLK provided forensic accounting services and consulting and testifying expert witness services to the estate, as described in the first, second and third interim fee applications filed by HLK with this Court [Dkt. Nos. 410, 1122 & 1343]. This Court approved each of HLK’s three interim fee applications in full [Dkt. Nos. 475, 1144 & 1398].

5. In September 2013, Mr. Klein left solo practice and became a partner at Skoda Minotti. On August 22, 2013, the Trustee filed an application for an order authorizing the employment and retention of Skoda Minotti to replace HLK as forensic accountant to the Trustee [Dkt. No. 1309]. This Court entered an order granting the Trustee’s application in its entirety and authorizing the retention of Skoda Minotti to replace HLK as forensic accountant and consulting and testifying expert on September 10, 2013 [Dkt. No. 1313].

6. On March 23, 2017, the Trustee filed a motion requesting court approval of the Trustee’s interim, monthly payment of 80% of the fees and 100% of the out-of-pocket costs incurred by the experts retained by the Trustee, including those experts retained in the Textron Litigation [Dkt. No. 2291]. This Court entered an order granting the Trustee’s motion regarding

interim compensation of those experts, including Skoda Minotti, on April 14, 2017 (the “**Expert Compensation Order**”) [Dkt. No. 2298].

**SUMMARY OF COMPENSATION AND EXPENSE
REIMBURSEMENT REQUESTED**

7. Skoda Minotti files this Application seeking allowance for payment of services performed and expenses incurred during the period from October 1, 2018 through and including August 31, 2019 (the “**Application Period**”). The Application is subject to, *inter alia*, the Retention Order and the Expert Compensation Order. Skoda Minotti did not receive a retainer in connection with its engagement as an expert for the Trustee. It has received compensation for services rendered and expenses incurred prior to the Application Period as a result of this Court’s approval of its first interim fee application [Dkt. No. 1613], second interim fee application [Dkt. No. 2069], third interim fee application [Dkt. No. 2250], fourth interim fee application [Dkt. No. 2446] and fifth interim fee application [Dkt. No. 2526]. Skoda Minotti also received interim compensation during the Application Period pursuant to the Expert Compensation Order. A summary of the compensation and expense reimbursement requested and paid during the Application Period is as follows:

Invoice date	Period Covered	Requested Fees	Fees paid	Requested Expenses	Expenses Paid
1/7/2019	October 1, 2018 - December 31, 2018	\$2,216.80	\$1,773.44	\$26.01	\$26.01
4/4/2019	January 1, 2019 - March 31, 2019	\$3,001.05	\$2,400.84	\$133.84	\$133.84
7/8/2019	April 30, 2019 - June 30, 2019	\$3,159.00	\$2,527.20	\$28.29	\$28.29
9/3/2019	July 1, 2019 - August 31, 2019	\$1,579.50	\$0.00	\$51.25	
		\$9,956.35	\$6,701.48	\$239.39	\$188.14

8. Exhibit A is a summary of invoices billed, amount paid and the 20% holdback amount during the Application Period.

9. Skoda Minotti has received no promise of payment for professional services rendered in this case other than in accordance with the provisions of the Bankruptcy Code.

10. Skoda Minotti kept daily time records detailing the services it performed and the time expended in connection with those services by project, as directed by the Guidelines for Compensation and Expense Reimbursement of Professionals, updated May 16, 2011 (the “**Guidelines**”).

11. The hourly billing rate of Skoda Minotti’s professionals and the number of hours billed for services rendered by each professional during the Application Period is set forth in Exhibit B. Set forth in Exhibit C is a chronological listing of services provided by Skoda Minotti’s professionals during the Application Period.

12. To the best of Skoda Minotti’s knowledge, it has complied with the monthly reporting requirements.

SUMMARY OF SERVICES RENDERED

13. A narrative summary of the project under which material and substantial services were performed by Skoda Minotti during the Application Period is set forth below. A more detailed description of the services provided by Skoda Minotti appears in Exhibit C. A summary of the individual projects performed by Skoda Minotti appears in Exhibit D.

14. The Trustee retained Skoda Minotti, pursuant to the Retention Order, to provide forensic accounting services and to be used as a consulting and testifying expert in connection with the Trustee's ongoing litigation, including, but not limited to, the Textron Litigation. The majority of the services provided by Skoda Minotti during the Application Period relate to Mr. Klein's consulting services in connection with the Textron Litigation. Other services provided by Mr. Klein during the Application Period include 1) assisting the Trustee in resolving issues related to the second interim distribution, 2) communications with the SEC and 3) tracking collections on the outstanding consumer receivables being performed by Monterey Financial Services. All the services provided by Skoda Minotti during the Application Period were provided by Mr. Klein and related primarily to the Textron litigation.

ALLOWANCE OF COMPENSATION

15. The allowance of interim compensation for services rendered and reimbursement of expenses in bankruptcy cases is expressly provided for in Section 331 of the Bankruptcy Code:

Any professional person...may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits, for such compensation for services rendered...as is provided under section 330 of this title.

11 U.S.C. § 331. Moreover, this Court authorized the filing of this Application in the Retention Order.

16. With respect to the level of compensation, Section 330(a)(1) of the Bankruptcy Code provides, in pertinent part, that the Court may award to a professional person “reasonable compensation for actual, necessary services rendered....” Section 330(a)(3)(A), in turn, provides:

In determining the amount of reasonable compensation to be awarded, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- (E) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3)(A). The clear Congressional intent and policy expressed in this statute is to provide for adequate compensation in order to continue to attract qualified and competent bankruptcy practitioners to bankruptcy cases.

17. As shown by this Application and the supporting documents, Skoda Minotti, and Mr. Klein in particular, has utilized its institutional knowledge of the Debtor’s bankruptcy case to efficiently and expeditiously assist the Trustee and his counsel with the ongoing Textron litigation. The compensation sought by Skoda Minotti for the services it is providing to the estate is appropriate given its level of expertise, and those services are necessary for the Trustee’s forensic examination of the Debtor’s assets and liabilities, his pursuit of litigation to recover assets for the estate, and his administration of claims.

REIMBURSEMENT OF EXPENSES

18. Skoda Minotti incurred actual and necessary out-of-pocket expenses in connection with rendering professional services to the estate in the sums indicated in Exhibit E. These expenses are comprised primarily of meetings with the Trustee and miscellaneous travel. Skoda Minotti respectfully requests full reimbursement for its out-of-pocket expenses.

CONCLUSION

19. No agreement or understanding exists between Skoda Minotti and any other person for the sharing of any compensation to be received for professional services rendered or to be rendered in connection with this case.

20. Except as set forth in this Application, no prior application has been made in this or any other court for the relief requested in the Application for the Application Period.

WHEREFORE, Skoda Minotti respectfully requests that this Court enter an order:

- a) approving the allowance for compensation of professional services rendered to the estate from October 1, 2018 through and including August 31, 2019, in the total sum of \$9,956.35;
- b) approving the reimbursement of Skoda Minotti's out-of-pocket expenses incurred in connection with the rendering of such professional services from October 1, 2018 through and including August 31, 2019, in the total sum of \$239.39;
- c) authorizing and directing the estate to pay compensation to Skoda Minotti in the amount of **\$1,991.27²**, representing the total amount for professional services rendered by Skoda Minotti during the period of October 1, 2018 through and including August 31, 2019, *less* amounts that have been paid or are in the process of being paid by the estate as of the date of this Application (as described on page 4); and
- d) granting such other and further relief as this Court may deem just and proper.

² Computed as follows: 20% holdback of \$1,675.37 (Exhibit A) plus 20% holdback of \$315.90 for fees in process of being paid for the period July 1, 2019 through August 31, 2019.

Dated: October 28, 2019

Respectfully submitted,

/s/ Howard L. Klein

Howard L. Klein, Partner
Skoda, Minotti & Co., Certified Public
Accountants, an Ohio corporation
6685 Beta Drive
Mayfield Village, Ohio 44143
Telephone: 440.605.7142
Email: hklein@skodaminotti.com

Electronically filed on behalf of Skoda Minotti
by,

/s/ Michael A. VanNiel

Michael A. VanNiel (0073948)
Baker & Hostetler LLP
Key Tower
127 Public Square, Suite 2000
Cleveland, Ohio 44114
Telephone: 216.621.0200
Facsimile: 216.696.0740
Email: mvanniel@@bakerlaw.com

Counsel for the Trustee

EXHIBIT A

SUMMARY OF INVOICES

Skoda Minotti
Summary of Invoices
Exhibit A

Invoice date	Period Covered		Requested Fees	Fees paid	20% Holdback	Requested Expenses	Expenses Paid	Balance
1/7/2019	10/1/2018	to 12/31/2018	\$2,216.80	\$1,773.44	\$443.36	\$26.01	\$26.01	\$443.36
4/4/2019	1/1/2019	to 3/31/2019	\$3,001.05	\$2,400.84	\$600.21	\$133.84	\$133.84	\$1,043.57
7/8/2019	4/1/2019	to 6/30/2019	\$3,159.00	\$2,527.20	\$631.80	\$28.29	\$28.29	\$1,675.37
9/3/2019	7/1/2018	to 8/31/2019	\$1,579.50	\$0.00	\$0.00	\$51.25		\$3,306.12
			-----	-----	-----	-----	-----	
			\$9,956.35	\$6,701.48	\$1,675.37	\$239.39	\$188.14	

Amount outstanding and 20% hold back

\$3,254.87

\$51.25

EXHIBIT B

SUMMARY OF HOURLY BILLING RATE AND HOURS BILLED BY SKODA MINOTTI

Summary By Staff
Exhibit B

Staff	Staff Level		Billing rate	Hours	Fees
H Klein	Partner		326.00	5.20	\$1,695.20
H Klein	Partner	50% rate	163.00	3.20	\$521.60
H Klein	Partner		351.00	21.30	\$7,476.30
H Klein	Partner	50% rate	175.50	1.50	\$263.25
			-----		-----
H Klein Total			1,015.50		\$9,956.35
				-----	-----
Grand Total				31.20	\$9,956.35
Totals per detailed schedule				31.20	9,956.35

EXHIBIT C

DESCRIPTION OF SERVICES PROVIDED BY SKODA MINOTTI

Skoda Minotti
Detailed Time Entries - FAIR FINANCE
Exhibit C

Date	Project	Grouping	Staff	Description	Hours	Billing rate	Fees
10/1/2018	Fee application	33	H Klein	Prepared fee application. (Billed at 50%)	3.20	\$163.00	\$521.60
10/1/2018	Textron	106	H Klein	Telephone [REDACTED] [REDACTED]	0.10	\$326.00	\$32.60
10/1/2018	Textron	106	H Klein	Prepared [REDACTED]	0.60	\$326.00	\$195.60
10/1/2018	Claims	8.6	H Klein	Split claim #5130 at request of Amanda Baker.	0.30	\$326.00	\$97.80
10/1/2018	Textron	106	H Klein	Reviewed [REDACTED] [REDACTED]	1.00	\$326.00	\$326.00
10/1/2018	Textron	106	H Klein	Read [REDACTED] [REDACTED]	0.30	\$326.00	\$97.80
10/5/2018	Textron	106	H Klein	Breakfast meeting with Brian Bash, Trustee. Status update.(1.1 hours - Billed expenses only.)	0.00	\$0.00	\$0.00
10/5/2018	Textron	106	H Klein	Follow-up on inquiries from Brian Bash.	0.70	\$326.00	\$228.20
10/5/2018	Monterey	10	H Klein	Analyzed Monterey's September collections.	0.20	\$326.00	\$65.20
10/10/2018	Textron	106	H Klein	Reviewed [REDACTED] [REDACTED]	1.10	\$326.00	\$358.60
10/23/2018	SEC	16	H Klein	Researched [REDACTED] [REDACTED] [REDACTED]	0.20	\$326.00	\$65.20
11/10/2018	Claims	8.6	H Klein	Split claim #4514 at request of Amanda Baker.	0.30	\$326.00	\$97.80
11/21/2018	Monterey	10	H Klein	Analyzed Monterey's October collections.	0.20	\$326.00	\$65.20
12/10/2018	Monterey	10	H Klein	Analyzed Monterey's November collections.	0.20	\$326.00	\$65.20
1/7/2019	Claims	8.7	H Klein	Researched IRS files for most recent guidelines on Ponzi schemes tax treatments for distributions to be included with 1099 mailings.	0.20	\$351.00	\$70.20

Skoda Minotti
Detailed Time Entries - FAIR FINANCE
Exhibit C

Date	Project	Grouping	Staff	Description	Hours	Billing rate	Fees
1/7/2019	Claims	8.7	H Klein	Researched IRS files for filing 1099s MISC.	0.30	\$351.00	\$105.30
1/7/2019	Claims	8.7	H Klein	Telephone call with Linda Kasych regarding 1099 due dates.	0.10	\$351.00	\$35.10
1/9/2019	Monterey	10	H Klein	Analyzed Monterey's December's collections. Performed additional analysis on active accounts.	0.40	\$351.00	\$140.40
1/9/2019	Claims	8.7	H Klein	Split claim #5246 at request of Amanda Baker.	0.20	\$351.00	\$70.20
1/15/2019	Meeting	32	H Klein	Breakfast meeting - status update, discussed sale of building, boxes in storage, GE claim. (1.1 hours - Billed expenses only.)	0.00	\$351.00	\$0.00
1/15/2019	Claims	8.7	H Klein	Researched General Electric claim per request from Bash	0.10	\$351.00	\$35.10
2/6/2019	Meeting	32	H Klein	Breakfast meeting with Brian Bash regarding West market building and Textron litigation. (1.0 hours - Billed expenses only.)	0.00	\$351.00	\$0.00
2/8/2019	Textron	106	H Klein	Researched [REDACTED].	1.50	\$351.00	\$526.50
2/8/2019	Textron	106	H Klein	[REDACTED]	1.20	\$351.00	\$421.20
2/8/2019	Textron	106	H Klein	Researched [REDACTED].	0.60	\$351.00	\$210.60
2/20/2019	Travel	34	H Klein	Round trip travel: Office to Fair Finance in Akron (1.5 hours billed at 50%)	1.50	\$175.50	\$263.25
2/20/2019	General	32	H Klein	Located files requested by Brian Bash.	0.20	\$351.00	\$70.20
2/22/2019	Monterey	10	H Klein	Analyzed Monterey's January's collections.	0.20	\$351.00	\$70.20

Skoda Minotti
Detailed Time Entries - FAIR FINANCE
Exhibit C

Date	Project	Grouping	Staff	Description	Hours	Billing rate	Fees
3/1/2019	Meeting	32	H Klein	Breakfast meeting with Brian Bash regarding Textron litigation. (1.0 hours - Billed expenses only.)	0.00	\$351.00	\$0.00
3/6/2019	Textron	106	H Klein	[REDACTED]	0.30	\$351.00	\$105.30
3/6/2019	Textron	106	H Klein	[REDACTED]	0.30	\$351.00	\$105.30
3/11/2019	Textron	106	H Klein	Researched [REDACTED]	1.10	\$351.00	\$386.10
3/11/2019	Textron	106	H Klein	Researched [REDACTED]	0.70	\$351.00	\$245.70
3/26/2019	Claims	8.7	H Klein	Researched Harry Sheets claim per request from Amanda Baker.	0.20	\$351.00	\$70.20
3/26/2019	Claims	8.7	H Klein	Researched Mellinger claim per request from Amanda Baker.	0.20	\$351.00	\$70.20
4/3/2019	Textron	106	H Klein	Reviewed [REDACTED]	1.50	\$351.00	\$526.50
4/4/2019	Claims	8.7	H Klein	Telephone call with Amanda Baker regarding claimant inquiries.	0.30	\$351.00	\$105.30
4/4/2019	Textron	106	H Klein	[REDACTED]	0.30	\$351.00	\$105.30
4/9/2019	Monterey	10	H Klein	Analyzed Monterey's March 2019 collections.	0.20	\$351.00	\$70.20
4/24/2019	Claims	8.7	H Klein	Split claim #2212 per request from Amanda Baker.	0.30	\$351.00	\$105.30
5/5/2019	Monterey	10	H Klein	Analyzed Monterey's April's 2019 collections.	0.20	\$351.00	\$70.20

Skoda Minotti
Detailed Time Entries - FAIR FINANCE
Exhibit C

Date	Project	Grouping	Staff	Description	Hours	Billing rate	Fees
5/14/2019	Consumer loans	5	H Klein	Researched check received by Trustee for loan number 637235.	0.20	\$351.00	\$70.20
5/16/2019	General	32	H Klein	Breakfast meeting with Brian Bash. Discussed winding up affairs, turned over keys to East Market Street Building. (1.1 hours - Billed expenses only.)	0.00	\$0.00	\$0.00
6/12/2019	Textron	106	H Klein	[REDACTED]	2.00	\$351.00	\$702.00
6/13/2019	Textron	106	H Klein	[REDACTED]	0.50	\$351.00	\$175.50
6/13/2019	Textron	106	H Klein	[REDACTED]	2.50	\$351.00	\$877.50
6/13/2019	Monterey	10	H Klein	Analyzed Monterey's May's 2019 collections.	0.20	\$351.00	\$70.20
6/19/2019	Textron	106	H Klein	Researched [REDACTED]	0.10	\$351.00	\$35.10
6/19/2019	Textron	106	H Klein	[REDACTED]	0.70	\$351.00	\$245.70
7/3/2019	Textron	106	H Klein	[REDACTED]	1.20	\$351.00	\$421.20
7/8/2019	Textron	106	H Klein	[REDACTED]	0.70	\$351.00	\$245.70
7/9/2019	Monterey	10	H Klein	Analyzed Monterey's June's 2019 collections and YTD update	0.30	\$351.00	\$105.30
7/18/2019	Meeting	32	H Klein	Breakfast meeting with Brian Bash. Discussed [REDACTED]. (1.0 hours - Billed expenses only.)	0.00	\$351.00	\$0.00

Skoda Minotti
Detailed Time Entries - FAIR FINANCE
Exhibit C

Date	Project	Group- ing	Staff	Description	Hours	Billing rate	Fees
7/22/2019	Textron	106	H Klein	[REDACTED] [REDACTED] [REDACTED]	0.30	\$351.00	\$105.30
8/9/2019	Monterey	10	H Klein	Analyzed Monterey's July's 2019 collections.	0.20	\$351.00	\$70.20
8/27/2019	Textron	106	H Klein	Researched [REDACTED] [REDACTED].	1.80	\$351.00	\$631.80
8/30/2019	Meeting	32	H Klein	Breakfast meeting with Brian Bash. Discussed [REDACTED] [REDACTED]. (1.0 hours - Billed expenses only.)	0.00	\$351.00	\$0.00
					-----		-----
					31.20	\$319.11	\$9,956.35
				Per summary of invoices			\$9,956.35

EXHIBIT D

SUMMARY BY PROJECT

Skoda Minotti
Summary By Project
Exhibit D

Code	Project	Hours	Fees
1	Secured and closed 7 branch offices		
2	Secured and maintained complex computer system consisting of 30 servers		
3	Learned various computer programs used by Fair including MAS200 (accounting system), Quick Books (accounting system), MIMCS (investor system), Fortis (dealer system)		
4	Assisted dealers in their transition to another funding source and ongoing inquiries.		
5	Assisted consumers with their financing loans	0.20	\$70.20
6	Determined outstanding investment certificates and earned interest for 5000 investors as of 2/7/10. Prepared roll forward of investor activity from 2006 through 2009.		
7	Government compliance issues including issuing final payroll reports for 2010, preparation and transmitting electronically over 5000 Form 1099s for 2009, investor Form 1099 inquiries, 401K plan dissolution, COBRA issues,		
8	Analysis of pre-petition and post-petition creditors		
8.5	Analysis of proof of claims		
8.6	Claim processing	0.60	\$195.60
8.7	Claim reconciliations	1.90	\$666.90
9	Preparation of SOFA and bankruptcy schedules		
10	Reviewed and monitor collections on finance receivable performed by Duvera / Monteray	2.30	\$792.30
11	Record management for records not seized by FBI. Reviewed, indexed 150 boxes from home office		
12	Closed Fair Finance accounting books for months ending 11/30/09, 12/31/09 and 1/31/10		
13	Maintained accounting books for Fair finance during Trustee period		
14	Traveled to Indianapolis to review 500 boxes of records seized by FBI		
15	Access to FBI records after 5/31/10, limited to scanned documents which requires significant more time to locate documents		
16	Meetings and cooperation with government agencies	0.20	\$65.20
17	Analysis of Ponzi scheme		
18	Analysis of Fair Finance and Fair Holdings insolvency for McKibbin report		
19	Analysis of fraudulent transfers		
20	Substantive consolidation		
21	Durham and Cochran general investigations		
22	Analysis of over 70 related companies which conducted business that affected Fair Finance		
23	Investigated real estate transactions involving Durham and Cochran		
24	Investigated auto transactions and other assets		
25	Tracing of Fair Finance cash movement through the numerous companies controlled by Durham		
26	Investigated Durham's dealings with alleged third party companies such as Cell Star and National Lampoon		
27	Investigated Durham's dealings with alleged third party Daniel La kin		
28	Investigated financing deals with Textron, Summit, Brevet and Fortress		
29	Investigated accounting firms		
30			
31			
32	General; meetings, background, emails, planning, mail	0.20	\$70.20
33	Prepared fee application. (Billed at 50%)	3.20	\$521.60
34	Travel at 50%	1.50	\$263.25
101	Preparation of expert report for McKibbin matter		
102	Fortress / Textron litigation		
103	Report for Fraudulent transfer litigation		
104	Criminal Trial		
105	National Lampoon		
106	Textron	21.10	\$7,311.10
107	Williams Trust trial		
	Totals	31.20	\$9,956.35
	Average	319.11	

EXHIBIT E

DESCRIPTION OF EXPENSES INCURRED BY SKODA MINOTTI

Skoda Minotti
Detail of Expenses
Exhibit E

Date	Code	Description of Expenses	Amount	Copy of invoice attached to invoice
10/5/2018	Meal	Breakfast meeting with Brian Bash in lieu of billing time. See time entry on 10/5/18	\$26.01	Yes
1/15/2019	Meal	Breakfast meeting with Brian Bash in lieu of billing time. See time entry on 1/15/19	\$33.00	Yes
2/6/2019	Meal	Breakfast meeting with Brian Bash in lieu of billing time. See time entry on 2/6/19	\$25.34	Yes
2/22/2019	Milegae	Roundtrip to/from Fair Finance building in Akron. (75 miles @.58 per mile)	\$43.50	N/A
3/1/2019	Meal	Breakfast meeting with Brian Bash in lieu of billing time. See time entry on 3/1/19	\$32.00	Yes
5/16/2019	Meal	Breakfast meeting with Brian Bash in lieu of billing time. See time entry on 5-16/19	\$28.29	yes
7/18/2019	Meal	Breakfast meeting with Brian Bash in lieu of billing time. See time entry on 7/18/19	\$26.25	Yes
8/30/2019	Meal	Breakfast meeting with Brian Bash in lieu of billing time. See time entry on 8/30/19	\$25.00	Yes

		Total	\$239.39	
		Per summary	\$239.39	

CERTIFICATE OF SERVICE

A copy of the foregoing has been served via ECF or regular, U.S. Mail, on October 28, 2019, on the attached service list.

/s/ Michael A. VanNiel

Michael A. VanNiel

Counsel for the Trustee

SERVICE LIST

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive e-mail notice/service for this case.

- Richard M Bain bain@buckleyking.com, krupa@buckleyking.com
- Stephen M. Bales sbales@zieglermetzger.com, dmalloy@zieglermetzger.com
- Brian A Bash bashtrustee@bakerlaw.com, bbash@ecf.epiqsystems.com
- Brian A. Bash BBash@bakerlaw.com
- Brian A. Bash bashtrustee@bakerlaw.com, bbash@ecf.epiqsystems.com
- John E. Bator jbator@batorlaw.com, sbator@batorlaw.com
- Alexis Beachdell abeachdell@bakerlaw.com, fairfinancedocket@bakerlaw.com
- Kathryn A. Belfance kb@rlblp.com
- John B. Blanton jblanton@bakerlaw.com
- Thomas J Budd disneydiver@me.com, law@disneydiver.com
- Kelly Burgan kborgan@bakerlaw.com
- Patrick W. Carothers pcarothers@leechtishman.com, bankruptcy@leechtishman.com;ghauswirth@leechtishman.com;dtomko@leechtishman.com
- Anthony J. Cespedes ajc1253@yahoo.com
- William Gregory Chris wchris@rlblp.com, hkoerner@rlblp.com
- Michael L. Cioffi cioffi@blankrome.com
- LeGrand L Clark legrand.clark@atg.in.gov, stephanie.patrick@atg.in.gov
- Deborah A. Coleman dacoleman@hahnlaw.com, hlpcr@hahnlaw.com;mcsoulsby@hahnlaw.com;cmbeitel@hahnlaw.com
- Anthony J DeGirolamo ajdlaw@sbcglobal.net, amber_weaver@sbcglobal.net;G23630@notify.cincompass.com
- Rocco I. Debitetto ridebitetto@hahnlaw.com, cmbeitel@hahnlaw.com
- Duriya Dhinojwala ddhinojwala@bmdllc.com, ddhinojwala@icloud.com
- Michelle DiBartolo-Haglock mdibartolo@ttmlaw.com, mldibartolo@gmail.com
- Breaden M. Douthett bdouthett@bakerlaw.com, fairfinancedocket@bakerlaw.com
- J Douglas Drushal ddrushal@ccj.com, lehman@ccj.com
- Charles R. Dyas charles.dyas@btlaw.com
- Robert W. Eckinger rwe@eckingerlaw.com
- Joseph Esmont jesmont@bakerlaw.com, joe.esmont@gmail.com;cbkfuturesinc@bakerlaw.com
- Joseph Esmont jesmont@bakerlaw.com, joe.esmont@gmail.com;cbkfuturesinc@bakerlaw.com
- Joseph E. Ezzie jezzie@bakerlaw.com
- Gregory R Farkas gfarkas@frantzward.com, dlbeatrice@frantzward.com
- Adam Lee Fletcher afletcher@bakerlaw.com
- Dov Frankel dfrankel@taftlaw.com, BHORVATH@TAFTLAW.COM;CLE_Docket_Assist@taftlaw.com
- Leon Friedberg lfriedberg@cpmlaw.com, efiling@cpmlaw.com
- Ronald P. Friedberg rfriedberg@meyersroman.com, vvardon@meyersroman.com
- Marc P Gertz mpgertz@goldman-rosen.com, debm@goldman-rosen.com
- Matthew Gold courts@argopartners.net
- Eric R. Goodman egoodman@bakerlaw.com
- Harry W. Greenfield bankpleadings@bucklaw.com, young@buckleyking.com;toole@buckleyking.com;heberlein@buckleyking.com
- Harry W. Greenfield greenfield@buckleyking.com, young@buckleyking.com;toole@buckleyking.com;heberlein@buckleyking.com
- John J Guy johnguy@neo.rr.com
- John J Guy johnguy@neo.rr.com
- Adam Bradley Hall amps@manleydeas.com
- Scott Holbrook sholbrook@bakerlaw.com
- H Ritchey Hollenbaugh hrh@cpmlaw.com, knocera@cpmlaw.com;slq@cpmlaw.com
- Rachel Huston rachel.huston@ohioattorneygeneral.gov
- Joseph F. Hutchinson jhutchinson@bakerlaw.com, sszalay@bakerlaw.com
- Steven G Janik , 8382591420@filings.docketbird.com
- Steven G Janik steven.janik@janiklaw.com, 8382591420@filings.docketbird.com

- Cynthia A Jeffrey bknotice@reimerlaw.com
- Kenneth C Johnson kjohnson@bricker.com, lpickett@bricker.com
- Nathaniel R. Jones jones-n@blankrome.com
- Mitchell A. Karlan mkarlan@gibsondunn.com,
ldunst@gibsondunn.com;nhart@gibsondunn.com;blutz@gibsondunn.com;mao@gibsondunn.com
- Patrick J Keating pkeating@bdblawn.com, sconard@bdblawn.com
- Scott J. Kelly scottkelly@skellylaw.com
- David Charles Knowlton dck@kckblawn.com
- John F Kostelnik jkostelnik@frantzward.com, dlbeatrice@frantzward.com
- Stuart A. Laven slaven@cavitch.com
- James Michael Lawniczak jlawniczak@calfee.com
- Trish D. Lazich trish.lazich@ohioattorneygeneral.gov, angelique.dennis-noland@ohioattorneygeneral.gov
- Stephen P Leiby sleiby@neolaw.biz, jackie@neolaw.biz
- Scott B. Lepene scott.lepene@thompsonhine.com,
Christine.Broz@thompsonhine.com;ECFDocket@thompsonhine.com
- Jeffrey M. Levinson jml@jml-legal.com
- Patrick T. Lewis plewis@bakerlaw.com, sjeney@bakerlaw.com
- Quintin F. Lindsmith qlindsmith@bricker.com, cwarner@bricker.com
- David A Looney David@OhioAttorney.com, davelooney1@gmail.com
- Bruce J.L. Lowe blowe@taftlaw.com, CLE_Docket_Assist@taftlaw.com;SMcKean@taftlaw.com
- Thomas R Lucchesi tlucchesi@bakerlaw.com
- Thomas R Lucchesi tlucchesi@bakerlaw.com
- Crystal L. Maluchnik crystal.maluchnik@janiklaw.com
- Crystal L. Maluchnik crystal.maluchnik@janiklaw.com
- Grant A Mason gamason@millermast.com
- Matthew H Matheney mmatheney@bdblawn.com, bhajduk@bdblawn.com
- Shorain L. McGhee shorain@smcgehelaw.com
- David W. Mellott dmellott@beneschlaw.com
- Tarek E. Mercho tmercho@mercholegal.com
- David P. Meyer dmeyer@dmlaws.com, docket@dmlaws.com
- David Polan Meyer dmeyer@dmlaws.com
- Michael J Moran mike@gibsonmoran.com, moranecf@gmail.com;r55982@notify.bestcase.com
- Michael J Moran moranecf@yahoo.com, moranecf@gmail.com;r55982@notify.bestcase.com
- David A Mucklow davidamucklow@yahoo.com
- David A Mucklow davidamucklow@yahoo.com
- Steven J. Mulligan stevenmulligan@cox.net
- Maritza S. Nelson mnelson@bakerlaw.com
- F. Anthony Paganelli tony@tonypaganelli.com
- Lucas Keith Palmer palmer@ccj.com, aaichele@ralaw.com
- David C. Perduk dperduk@perduklaw.com, jody@perduklaw.com
- Mark A Phillips mphilips@beneschlaw.com,
docket@beneschlaw.com;lbehra@beneschlaw.com;cgreen@beneschlaw.com
- Mark A Phillips mphilips@beneschlaw.com,
docket@beneschlaw.com;lbehra@beneschlaw.com;cgreen@beneschlaw.com
- Larry G. Poulos larry_poulos@yahoo.com
- Kenneth G. Prabucki kprabucki@bakerlaw.com
- Kenneth G. Prabucki kprabucki@bakerlaw.com
- Clinton E. Preslan ndohbky@jbandr.com
- Clinton E. Preslan cpreslan@preslanlaw.com
- David F. Proano dproano@bakerlaw.com, fairfinancedocket@bakerlaw.com
- David F. Proano dproano@bakerlaw.com, fairfinancedocket@bakerlaw.com
- Stephen J Pruneski spruneski@rlblp.com
- Timothy J Richards trichards@frantzward.com,
dlbeatrice@frantzward.com;timrichardslegal1976@gmail.com
- Mark Riemer mriemer@goldman-rosen.com
- Tim Robinson tim.robinson@dinsmore.com, lisa.geeding@dinsmore.com
- Tim Robinson tim.robinson@dinsmore.com, lisa.geeding@dinsmore.com

- James E. Rossow jim@rubin-levin.net, robin@rubin-levin.net;lisa@rubin-levin.net;atty_jer@trustesolutions.com
- James E. Rossow jim@rubin-levin.net, robin@rubin-levin.net;lisa@rubin-levin.net;atty_jer@trustesolutions.com
- Colin P. Sammon colin.sammon@janiklaw.com, Julie.Zakrzewski@Janiklaw.com
- Matthew J. Samsa msamsa@mcdonaldhopkins.com, docket@beneschlaw.com;cgreen@beneschlaw.com
- James Preston Schuck jschuck@bricker.com, cwarner@bricker.com
- Richard V. Singleton rsingleton@blankrome.com, kreda@blankrome.com;jhanner@blankrome.com
- Dale S Smith dsmith@frantzward.com, dlbeatrice@frantzward.com
- Sheldon Stein ssteindocs@gmail.com, kristine@steintrustee.com;sheldon@steintrustee.com
- Rachel L. Steinlage rsteinlage@meyersroman.com, jray@meyersroman.com;mnnowak@meyersroman.com
- Ray H Stoess raystoess@600westmain.com
- Megan D. Stricker mnovinc@davisyoung.com, gcampbell@davisyoung.com
- Timothy M. Sullivan tim@tmslaw.net, crystal@tmslaw.net
- Jonathan D. Sundheimer jsundheimer@btlaw.com
- Gregory D Swope gswope@kwgd.com, mhelmick@kwgd.com
- David J. Theising dtheising@harrisonmoberly.com
- Ronald N. Towne rtowne@neolaw.biz, awehener@neolaw.biz
- Vance P. Truman medinaatty@vancetruman.com
- United States Trustee (Registered address)@usdoj.gov
- Michael S Tucker mtucker@ulmer.com
- Nancy A. Valentine nancy.valentine@icemiller.com, carol.builder@icemiller.com
- Michael A. VanNiel mvanniel@bakerlaw.com
- Thomas C Wagner wagnert@tcwlawyers.com, wagnert@vwlawyers.com
- Daniel Rubin Warren dwarren@bakerlaw.com
- Wayne County Litigants ddrushal@ccj.com
- Nicholas L. White nwhite@bakerlaw.com, fairfinancedocket@bakerlaw.com
- Alicia Raina Whiting-Bozich whiting-bozich@buckleyking.com, heberlein@buckleyking.com
- Douglas Wolfe dwolfe@asmcapital.com
- Lenore Kleinman ust04 Lenore.Kleinman@usdoj.gov
- Maria D. Giannirakis ust06 maria.d.giannirakis@usdoj.gov

Manual Notice List

The following is the list of **parties** who are **not** on the list to receive e-mail notice/service for this case (who therefore require manual noticing/service).

Emily S. Donahue
Jackson Walker L.L.P.
2323 Ross Avenue, Suite 600
Dallas, TX 75202

Christine A. Arnold
6005 Twin Lakes Drive
Parma, OH 44219

Dennis S. Sumerix
18592 Edwards Road, Lot 171
Doylestown, OH 44230-9546

Leon Friedberg
Dennis J. Concilla
Carl A. Aveni
H. Ritchey Hollenbaugh
Carlile Patchen & Murphy LLP
366 Broad Street
Columbus, OH 43215

Robert Boote
Ballard Shahr LLP
919 North Market Street, 12th Floor
Wilmington, DE 19801-3034

Leslie C Heilman
Ballard Spahr LLP
919 North Market Street, 12th Floor
Wilmington, DE 19801-3034

Maria D. Giannirakis
Office of the United States Trustee
Howard M. Metzenbaum U.S. Courthouse
201 Superior Avenue East, Suite 441
Cleveland, OH 44114

Lothar Jung
12962 W. Linden Avenue
Parma, OH 44130-5817

John J. Kuster
Benjamin R. Nagin
Sidley Austin LLP
787 Seventh Avenue
New York, NY 10019

Eric W. Sleeper
Barton Barton & Plotkin LLP
420 Lexington Avenue
New York, NY 10170

Gary Sallee
11650 Olivo Road, Suite 1000-333
Fishers, IN 46037

Robert Hanlon
Eileen Hanlon
P.O. Box 42
State Route 43
Mogadore, OH 44260

John McCauley, Esq.
J. Richard Kiefer, Esq.
Bingham McHale LLP
2700 Market Tower
10 West Market Street
Indianapolis, IN 46204

Tobey Daluz
Ballard Spahr LLP
919 North Market Street, 12th Floor
Wilmington, DE 19801-3034

Jay Jaffe
Faegre Baker Daniels LLP
600 E. 96th Street, Suite 600
Indianapolis, IN 46240

Michael V. Demczyk
12370 Cleveland Avenue, NW
P.O. Box 867
Uniontown, OH 44685

Charles Boerner
1848 Ritchie Road
Stow, OH 44224

JM Partners LLC
Attn: John Marshall
6800 Paragon Place, Suite 202
Richmond, VA 23230-1656